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11 *Counsel for non-party Peter R. Fader*
12 *in Adv. Proc. No. 20-03007*

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

Peter R. Fader
dba Urchin Capital Partners
dba Urchin Partners LLC,

Debtor.

E. LYNN SCHOENMANN, TRUSTEE FOR
THE CHAPTER 7 BANKRUPTCY ESTATE
OF PETER R. FADER,

Plaintiff,

v.

STEVEN R. BOAL; QUOTIENT
TECHNOLOGY, INC., a Delaware
corporation; and DOES 1 through 10,

Defendants.

Bankruptcy Case No. 08-30119

Chapter 7

Adversary Proceeding No. 20-03007

**NOTICE OF HEARING OF COUNTER-
MOTION OF NON-PARTY PETER FADER FOR
DISGORGEMENT AND RETURN OF FEES,
SANCTIONS AND INJUNCTIVE RELIEF**

Date: June 2, 2023

Time: 10:30 a.m.

**THE HEARING WILL BE CONDUCTED BY
VIDEO**

Please take notice that non-party Peter Fader will, and hereby does, counter-move at a hearing before the Honorable Dennis Montali by video conference at 10:30 a.m. on June 2, 2023 for an order requiring William F. Abbott to disgorge and return the following the following “fees” he received from Mr. Fader without authorization from this Court and in violation of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and this Court’s rules governing fee agreements:

1 \$18,000 he was paid “during the first Adversary Proceeding.” Abbott Decl. ¶ 9.

2 \$10,300 he was paid “[b]etween February, 2011 and January, 2012.” *Id.*, ¶ 10.

3 \$2,000 he was paid “[i]n October, 2017.” *Id.*, ¶ 16.

4 For a total of \$30,300.

5 It also appears that Mr. Abbott was paid an additional \$25,000 for representing Mr. Fader
6 in another lawsuit that bears some relationship to the bankruptcy proceeding, given that Mr.
7 Abbott has included it in his declaration. *Id.*, ¶ 12.

8 If this is added to the \$30,300 above, the total sum paid Mr. Abbott for representing Mr.
9 Fader in connection with the bankruptcy, adversary and bankruptcy-related cases is \$55,300,
10 which, as demonstrated in the accompanying counter-motion, as matter of law, he should be
11 required to disgorge and return to Mr. Fader.

12 Mr. Fader will also move for appropriate monetary sanctions, and to enjoin Mr. Abbott
13 from breaching his obligation to maintain Mr. Fader’s attorney-client privilege.

14 Dated: May 20, 2023

15 /s/ *Loren Kieve*

16 Loren Kieve

17 Attorney for non-party Peter R. Fader